



FEDERAL ELECTION COMMISSION
Washington, DC 20463

September 21, 2022

Via Electronic Mail
reiff@sandlerreiff.com

Neil P. Reiff, Esq.
Sandler, Reiff, Lamb, Rosenstein & Birkenstock P.C.
1090 Vermont Avenue, NW, Suite 750
Washington, DC 20005

RE: MUR 8070
Democratic Executive Committee of
Florida

Dear Mr. Reiff:

In the normal course of carrying out its supervisory responsibilities, the Federal Election Commission (the "Commission") became aware of information suggesting that your client, Democratic Executive Committee of Florida and Fran Garcia, in her official capacity as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). On September 13, 2022, the Commission found reason to believe that your client violated 52 U.S.C. §§ 30104(b)(8), 30116(f), and 30118(a), provisions of the Act, and 11 C.F.R. §§ 103.3(b), 104.3(d), 110.4(c)(3), 110.9, provisions of the Commission's regulations. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is enclosed for your information.

In order to expedite the resolution of this matter, the Commission has authorized the Office of the General Counsel to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Pre-probable cause conciliation is not mandated by the Act or the Commission's regulations, but is a voluntary step in the enforcement process that the Commission is offering to you as a way to resolve this matter at an early stage and without the need for briefing the issue of whether or not the Commission should find probable cause to believe that you violated the law.

Enclosed is a conciliation agreement for your consideration

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Please note that you have a legal obligation to preserve all documents, records and materials relating to this matter until such time as you are notified that the Commission has closed its file in this matter. *See* 18 U.S.C. § 1519.

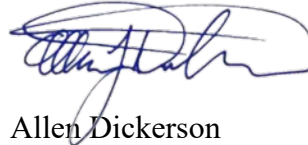
If your client is interested in engaging in pre-probable cause conciliation, please contact Crystal Liu, the attorney assigned to this matter, at (202) 694-1273 or cliu@fec.gov, within seven days of receipt of this letter. During conciliation, you may submit any factual or legal materials that you believe are relevant to the resolution of this matter. Because the Commission only enters into pre-probable cause conciliation in matters that it believes have a reasonable opportunity for settlement, we may proceed to the next step in the enforcement process if a mutually acceptable conciliation agreement cannot be reached within sixty days. *See* 52 U.S.C. § 30109(a), 11 C.F.R. Part 111 (Subpart A). Conversely, if you are not interested in pre-probable cause conciliation, the Commission may conduct formal discovery in this matter or proceed to the next step in the enforcement process. Please note that once the Commission enters the next step in the enforcement process, it may decline to engage in further settlement discussions until after making a probable cause finding.

Pre-probable cause conciliation, extensions of time, and other enforcement procedures and options are discussed more comprehensively in the Commission's "Guidebook for Complainants and Respondents on the FEC Enforcement Process," which is available on the Commission's website at http://www.fec.gov/em/respondent_guide.pdf.

This matter will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. Please be advised that, although the Commission cannot disclose information regarding an investigation to the public, it may share information on a confidential basis with other law enforcement agencies.¹

We look forward to your response.

On behalf of the Commission,



Allen Dickerson
Chairman

Enclosures:

1. Factual and Legal Analysis

¹ The Commission has the statutory authority to refer knowing and willful violations of the Act to the Department of Justice for potential criminal prosecution, 52 U.S.C. § 30109(a)(5)(C), and to report information regarding violations of law not within its jurisdiction to appropriate law enforcement authorities. *Id.* § 30107(a)(9).

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Democratic Executive Committee of Florida MUR 8070
and Fran Garcia in her official capacity as treasurer

I. INTRODUCTION

This matter was generated by a Reports Analysis Division (“RAD”) Referral concerning disclosure reports filed by the Democratic Executive Committee of Florida and Fran Garcia in her official capacity as treasurer (the “Committee”) that disclosed additional incurred debts of \$284,569.71, and the Committee’s acceptance of excessive and prohibited contributions totaling \$200,700.¹ The Committee generally does not dispute the allegations, but requests that the Commission take no further action or refer this matter to the Alternative Dispute Resolution Office (“ADRO”) in light of the remedial measures it has taken.²

For the reasons discussed below, the Commission opens a Matter Under Review (“MUR”) and finds reason to believe that the Committee violated: (1) 52 U.S.C. § 30104(b)(8) and 11 C.F.R. § 104.3(d) by failing to report \$284,569.71 in debts; (2) 52 U.S.C. § 30116(f) and 11 C.F.R. §§ 103.3(b)(3), 110.9 by accepting excessive contributions totaling \$175,200; (3) 52 U.S.C. § 30118(a) and 11 C.F.R. §§ 103.3(b), 110.4(c)(3), 110.9 by accepting prohibited contributions totaling \$5,500; and (4) 52 U.S.C. §§ 30116(f) and/or 30118(a) and 11 C.F.R. § 103.3(b) by accepting an excessive and/or prohibited \$20,000 contribution from an unregistered organization.

¹ Referral at 1 (Feb. 18, 2022). Although the Committee failed to timely remedy excessive and prohibited contributions totaling \$200,700, the Committee was permitted to use \$50 of the \$500 it received from an anonymous donor. 11 C.F.R. § 110.4(c)(3).

² Resp. at 1-2 (Mar. 30, 2022).

II. FACTUAL BACKGROUND

A. Additional Debt Disclosure

The Democratic Executive Committee of Florida is the Florida state committee for the Democratic Party, and Fran Garcia is its treasurer.³ On December 3, 2020, the Committee filed a 2020 30-Day Post-Election Report disclosing \$62,595.33 of debt.⁴ The Committee filed Amended 2020 30-Day Post-Election Reports on January 29, 2021, and on May 17, 2021, disclosing, *inter alia*, additional incurred debts totaling \$284,569.71.⁵

In response to a Request for Additional Information (“RFAI”) as to the second Amended 2020 30-Day Post-General Report, the Committee filed an FEC Form 99 Miscellaneous Text Submission on July 8, 2021, stating:

At the time of the original filing of the Committee’s 2020 30G report, invoices from the vendors had not yet been received. When the Committee filed the amendment to the 2021 30G on 5/17/21, additional invoices from the three vendors had been submitted that had not been received in 2020. In an effort to provide accurate information, and maintain accurate disclosures for the public record, the Committee included the additional debts on the amended report, in order to correspond with the dates of the invoices presented by the vendors.⁶

³ Democratic Executive Committee of Florida, Statement of Organization at 3 (June 30, 2021), <https://docquery.fec.gov/pdf/280/202106309450893280/202106309450893280.pdf>.

⁴ Referral at 3; Democratic Executive Committee of Florida, 2020 30-Day Post-Election Report at 2 (Dec. 3, 2020), <https://docquery.fec.gov/pdf/529/202012039351641529/202012039351641529.pdf>.

⁵ Democratic Executive Committee of Florida, Amended 2020 30-Day Post-Election Report at 2808, 2811, 2813 (Jan. 29, 2021), <https://docquery.fec.gov/pdf/346/202101299418172346/202101299418172346.pdf> (reporting \$8,000 of outstanding debt and \$276,569.71 of newly incurred debt); Democratic Executive Committee of Florida, Amended 2020 30-Day Post-Election Report at 2583 (May 17, 2021), <https://docquery.fec.gov/pdf/804/202105179446843804/202105179446843804.pdf> (recharacterizing the previously reported \$8,000 debt as newly incurred).

⁶ Democratic Executive Committee of Florida, Miscellaneous Text Submission (July 8, 2021), <https://docquery.fec.gov/pdf/901/202107089450998901/202107089450998901.pdf>.

On February 18, 2022, RAD referred the Committee to the Office of General Counsel (“OGC”) for failing to disclose \$284,569.71 of additional incurred debts in its original 2020 30-Day Post-Election Report.⁷

B. Acceptance of Excessive and Prohibited Contributions

RAD also referred the Committee for accepting excessive and prohibited contributions totaling \$200,700.⁸ The Committee accepted \$175,200 in excessive contributions from 10 individuals.⁹ Except for \$2,000 in excessive contributions from Kirkland Hicks, these contributions were refunded or transferred, albeit 77 to 475 days after their receipt.¹⁰ The Committee does not dispute that it accepted \$175,200 in excessive contributions, but it disagrees that the excessive contributions from Kirkland Hicks was not remedied.¹¹ In its Response, the Committee states, “the contribution from Kirkland Hicks was, in fact, initially refunded on September 30, 2020, and was ultimately reissued on September 30, 2021.”¹² The Committee, however, did not report such a refund in its 2020 or 2021 October Monthly Report.¹³

⁷ Referral at 1. The Amended 2020 30-Day Post-Election Reports disclosed debts in addition to the \$284,569.71 of newly disclosed debts at issue here. *Compare* Democratic Executive Committee of Florida, 2020 30-Day Post-Election Report at 2 (Dec. 3, 2020), <https://docquery.fec.gov/pdf/529/202012039351641529/20201220039351641529.pdf> (disclosing \$62,595.33 of debt), *with* Democratic Executive Committee of Florida, Amended 2020 30-Day Post-Election Report at 2 (Jan. 29, 2021), <https://docquery.fec.gov/pdf/346/202101299418172346/202101299418172346.pdf> (disclosing \$529,315.02 of debt) *and* Democratic Executive Committee of Florida, Amended 2020 30-Day Post-Election Report at 2 (May 17, 2021), <https://docquery.fec.gov/pdf/804/202105179446843804/202105179446843804.pdf> (disclosing \$520,547.55 of debt). However, those other “debts” were actually “refunds of excessive contributions owed by the Committee in response to multiple” RFAs and so they are not a subject of this Referral. Referral at 4 n.1.

⁸ Referral at 1.

⁹ Referral at 5, Attach. 2 at 2-4.

¹⁰ *Id.*, Attach. 2 at 2-4.

¹¹ Resp. at 1.

¹² *Id.*

¹³ Democratic Executive Committee of Florida, 2021 October Monthly Report (Oct. 20, 2021), <https://docquery.fec.gov/pdf/321/202010209298278321/202010209298278321.pdf>; Democratic Executive Committee of Florida, Amended 2020 October Monthly Report (May 4, 2021), <https://docquery.fec.gov/pdf/309/202105049446287309/202105049446287309.pdf>; Democratic Executive Committee of Florida, Amended 2020 October Monthly

1 In addition, the Committee accepted \$5,000 from a corporation and \$500 from an
 2 anonymous contributor.¹⁴ The Committee refunded the contribution from the corporation 145
 3 days after its receipt, and the anonymous contribution was not remedied.¹⁵ The Committee does
 4 not dispute that it accepted these contributions but disagrees that it did not remedy the
 5 anonymous contribution. Specifically, the Response states that the anonymous contribution was
 6 recently remedied via a transfer.¹⁶ While the Committee's 2022 April Monthly Report notes a
 7 \$500 transfer of an "unknown contribution,"¹⁷ it states that the Committee transferred an
 8 unknown contribution received in 2018 and the contribution at issue here was received on
 9 March 2, 2020.¹⁸

Report (Dec. 15, 2020); <https://docquery.fec.gov/pdf/386/202012159387343386/202012159387343386.pdf>;
 Democratic Executive Committee of Florida, 2020 October Monthly Report (Oct. 20, 2020); <https://docquery.fec.gov/pdf/321/202010209298278321/202010209298278321.pdf>.

¹⁴ Referral at 5.

¹⁵ *Id.*, Attach. 2 at 5.

¹⁶ Resp. at 1.

¹⁷ Democratic Executive Committee of Florida, 2022 April Monthly Report at 180-81 (Apr. 20, 2022), <https://docquery.fec.gov/pdf/879/202204209500201879/202204209500201879.pdf> ("Represents transfer of Unknown, Unknown contribution received in 2018. Original contribution was received through a brokerage account. Committee was unable to obtain original donor's information and transfer from Federal Account was never executed.").

¹⁸ Democratic Executive Committee of Florida, 2020 April Monthly Report at 95-96 (Aug. 5, 2020), <https://docquery.fec.gov/pdf/996/202008059261260996/202008059261260996.pdf>. While this report indicates that the anonymous donation was "returned" in July 2020, *id.* at 96, this refund was not reported in the Committee's 2020 August Monthly Report, Amended 2020 August Monthly Report (Dec. 8, 2020), <https://docquery.fec.gov/pdf/865/202012089366424865/202012089366424865.pdf>, and the Committee admits in its Response that it was not "able to confirm any refund related to this contribution," Resp. at 1. The Committee's 2022 February and March Monthly Reports also do not report a refund of the March 2, 2020 unknown contribution. Democratic Executive Committee of Florida, 2022 March Monthly Report (Mar. 19, 2022), <https://docquery.fec.gov/pdf/335/202203199494041335/202203199494041335.pdf>; Democratic Executive Committee of Florida, Amended 2022 February Monthly Report (Mar. 18, 2022), <https://docquery.fec.gov/pdf/636/202203189494036636/202203189494036636.pdf>.

1 Finally, the Committee accepted an excessive and/or prohibited \$20,000 contribution
2 from an unregistered organization,¹⁹ which it refunded 100 days after its receipt.²⁰ The
3 Committee does not dispute that it accepted this contribution. The contributions at issue here,
4 and the Committee's remedial actions, are summarized below:

Excessive Contributions			
Contributor Name	Contribution Amount	Days Until Remedy	Remedy Type
Andrew Beck	\$15,000	293	Refund
Frank Brunckhorst	\$10,000	243	Refund
Robert L. Crandall	\$20,000	231	Refund
Genevieve Lykes Dimmitt	\$6,000	267-292	Refund
Kirkland Hicks	\$2,000 ²¹	Not Remedied	N/A
Barbara A. Stiefel	\$1,000 ²²	456	Refund
Lawrence J. Schorr	\$10,000	77	Transfer
Gary Sugarman	\$9,700	79-136	Transfer
Jeffrey C. Walker	\$100,000	253	Refund
Alex Warshofsky	\$1,500	475	Refund
Prohibited Contributions			
Contributor Name	Contribution Amount	Days Until Remedy	Remedy Type
Peter Leach & Associates Inc.	\$5,000	145	Refund
Unknown, Unknown J.	\$500	Not Remedied	N/A
Excessive and/or Prohibited Contribution from an Unregistered Organization			
Contributor Name	Contribution Amount	Days Until Remedy	Remedy Type
Sunshine PAC ²³	\$20,000	100	Refund

¹⁹ Referral at 5.

²⁰ *Id.*, Attach. 2 at 5.

²¹ While the Referral indicates that the Committee accepted an additional \$1,000 of excessive contributions from Kirkland Hicks in April 2020 that were not timely remedied, this was not an issue in the RFAI addressing the 2020 May Monthly report and so it is not subject of the Referral. Referral, Attach. 2 at 2-3; *see also* Democratic Executive Committee of Florida, RFAI (July 8, 2020), <https://docquery.fec.gov/pdf/719/202007080300075719/202007080300075719.pdf>.

²² While the Referral indicates that the Committee accepted an additional \$5,000 of excessive contributions from Barbara A. Stiefel in February 2020 that were not timely remedied, this was not an issue in the RFAI referencing the 2020 March Monthly Report and so it is not subject of the Referral. Referral, Attach. 2 at 3; *see also* Democratic Executive Committee of Florida, RFAI (May 11, 2020), <https://docquery.fec.gov/pdf/565/202005110300070565/202005110300070565.pdf>

²³ The Florida Division of Elections' website reveal three committees with the word "sunshine" in their name: Sunshine Leadership, Sunshine PAC of America, and Sunshine Pac of Florida. *Committees*, FLA. FL DIV. OF ELECTIONS, <https://dos.elections.myflorida.com/committees/ComLkupByName.asp> (last accessed Aug. 3, 2022). However, only the Sunshine Leadership PAC reported any activity in 2020 and none of these committees share the

1 **III. LEGAL ANALYSIS**

2 **A. Debt Disclosure**

3 The Federal Election Campaign Act of 1971, as amended (the “Act”), and the
 4 Commission’s regulations require political committees to disclose “the amount and nature of
 5 outstanding debts and obligations owed by or to such political committee[s].”²⁴ “A debt or
 6 obligation, including a loan, written contract, written promise or written agreement to make an
 7 expenditure, the amount of which is over \$500 shall be reported as of the date on which the debt
 8 or obligation is incurred.”²⁵ “If the exact amount of a debt or obligation is not known, the report
 9 shall state that the amount reported is an estimate.”²⁶ In addition, “[d]ebts and obligations owed
 10 by or to a political committee which remain outstanding shall be continuously reported until
 11 extinguished.”²⁷

12 Here, the Committee failed to disclose \$284,569.71 of debts on its original 2020 30-Day
 13 Post-Election Report, which it does not dispute.²⁸ The Committee requests the Commission take

same address as reported on the Committee’s 2020 July Monthly Report. In the event Sunshine PAC is a Florida state political committee, Florida state law provides that the following list of entities, in addition to natural persons, may contribute to political committees: “corporation, association, firm, partnership, joint venture, joint stock company, club, organization, estate, trust, business trust, syndicate, or other combination of individuals having collective capacity.” Fla. Stat. Ann. § 106.011(14) (West) (defining “person”); *see also id.* § 106.08 (providing limits to the amounts that “persons” may contribute).

²⁴ 52 U.S.C. § 30104(b)(8); *see also* 11 C.F.R. § 104.3(d) (requiring committees to “disclose the amount and nature of outstanding debts and obligations owed by or to the reporting committee”).

²⁵ 11 C.F.R. § 104.11(b) (excepting certain categories of regularly reoccurring administrative expenses not relevant here).

²⁶ *Id.*

²⁷ *Id.* § 104.11(a).

²⁸ *See Resp.* at 1-2; *compare* Democratic Executive Committee of Florida, 2020 30-Day Post-Election Report at 2 (Dec. 3, 2020), <https://docquery.fec.gov/pdf/529/202012039351641529/202012039351641529.pdf> (reporting \$62,595.33 of debt), *with* Democratic Executive Committee of Florida, Amended 2020 30-Day Post-Election Report at 2 (Jan. 29, 2021), <https://docquery.fec.gov/pdf/346/202101299418172346/202101299418172346.pdf> (reporting \$529,315.02 of debt), *and* Democratic Executive Committee of Florida, Amended 2020 30-Day Post-Election Report at 2 (May 17, 2021), <https://docquery.fec.gov/pdf/804/202105179446843804/202105179446843804.pdf> (reporting \$520,547.55 of debt)

no further action, or refer the matter to ADRO, as it has hired a new, outside compliance firm in late 2020 to audit its 2020 election cycle activities.²⁹ However, the Commission has pursued matters involving similar debt-reporting violations.³⁰

Accordingly, the Commission finds reason to believe that the Committee violated 52 U.S.C. § 30104(b)(8) and 11 C.F.R. § 104.3(d) by failing to disclose \$284,569.71 of additional incurred debts in its original 2020 30-Day Post-Election Report.

B. Acceptance of Excessive and Prohibited Contributions

The Act and the Commission’s regulations provide that no person shall make contributions to a political committee established and maintained by a State committee of a political party in any calendar year that, in the aggregate, exceed \$10,000.³¹ Further, the Act provides that no political committee shall knowingly accept any contribution that exceeds this limit.³² Contributions which either exceed the \$10,000 limit on their face or in the aggregate may be deposited or returned to the contributor.³³ If the excessive contribution is accepted, the

²⁹ Resp. at 1-2.

³⁰ See Factual & Legal Analysis (“F&LA”) at 3-4, MUR 7895 (DNC Services Corp.) (finding reason to believe that a committee violated 52 U.S.C. § 30104(b)(8) and 11 C.F.R. §§ 104.3(d), 104.11(a), (b) when it failed to disclose additional outstanding debts in its year-end report, even though the committee stated that it was not aware of the debts when it filed the report; that “it became aware of these invoices [indicating debts] through communications with vendors”; that it only “became aware of the undisclosed debts from its annual external financial audit”; and that it “implemented a new software program that automates processes that in the past were manually performed, thus reducing the chance of future errors”); F&LA at 1-2, MUR 6508 (RNC) (finding reason to believe that a committee violated what is now 52 U.S.C. § 30104(b)(8) and 11 C.F.R. §§ 104.3(d), 104.11(b) by failing to report additional newly incurred debts in its monthly reports, even though the committee stated that the additional debts “were discovered during a self-initiated internal review process, which was undertaken in connection with the arrival a new Chief of Staff and Finance Director,” and that these efforts “resulted in new processes to prevent similar issues from arising in the future”).

³¹ 52 U.S.C. § 30116(a)(1)(D); 11 C.F.R. § 110.1(c)(5).

³² 52 U.S.C. § 30116(f); see also 11 C.F.R. § 110.9 (“No candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of 11 CFR part 110.”).

³³ 11 C.F.R. § 103.3(b)(3).

treasurer may request redesignation or reattribution of the contribution.³⁴ If a redesignation or reattribution is not obtained, the treasurer must refund the contribution to the contributor within 60 days of receipt.³⁵

In addition, political committees are prohibited from accepting contributions that are not subject to the prohibitions of the Act,³⁶ including anonymous cash contributions in excess of \$50³⁷ and contributions from corporations³⁸ unless the political committee is an independent expenditure-only political committee.³⁹ If the treasurer cannot determine whether a contribution complies with the source prohibitions of the Act, the treasurer must refund the contribution to the contributor within 30 days of receiving the contribution.⁴⁰

Further, political committees may not accept contributions from unregistered organizations that do not demonstrate that the underlying funds are subject to the limitations and prohibitions of the Act.⁴¹ The treasurer of a political committee is responsible for ensuring that all contributions received comply with those limitations and prohibitions.⁴²

³⁴ *Id.*

³⁵ *Id.*

³⁶ *See* 52 U.S.C. § 30118(a).

³⁷ 11 C.F.R. § 110.4(c)(3) (“A candidate or committee receiving an anonymous cash contribution in excess of \$50 shall promptly dispose of the amount over \$50. The amount over \$50 may be used for any lawful purpose unrelated to any Federal election, campaign, or candidate.”).

³⁸ 52 U.S.C. § 30118(a).

³⁹ *See* Advisory Op. 2010-11 at 2-3 (Commonsense Ten) providing that corporations may contribute to IEOPCs).

⁴⁰ 11 C.F.R. § 103.3(b)

⁴¹ *See id.* § 102.5(b)(1) (providing that an unregistered organization must show that it has “received sufficient funds subject to the limitations and prohibitions of the Act to make [a] . . . contribution”); *see also* 52 U.S.C. §§ 30116(f), 30118(a).

⁴² 11 C.F.R. § 103.3(b); F&LA at 4-5, MUR 7872 (South Dakota Democratic Party) (finding reason to believe that a state party committee violated 11 C.F.R. § 103.3(b) by accepting contributions from unregistered organizations without ascertaining whether the underlying funds complied with the limitations and prohibitions of the Act).

1 The available information shows that, during the 2020 calendar year, the Committee
2 accepted excessive contributions totaling \$175,200, prohibited contributions totaling \$5,500, and
3 an excessive and/or prohibited contribution of \$20,000,⁴³ which the Committee does not dispute.
4 Except for the \$2,000 of excessive contributions from Kirkland Hicks and the \$500 contribution
5 from an anonymous donor, the contributions were eventually remedied via a refund or transfer.
6 However, the Committee waited between 77 and 475 days after receiving each of the
7 contributions before remedying them, which is past the permissible remedial timeframe of 30 to
8 60 days after receipt of the contributions.⁴⁴ Even if, as indicated in the Response, the excessive
9 contributions from Kirkland Hicks was refunded on September 30, 2020, and the anonymous
10 contribution was transferred on March 30, 2022, the Committee still untimely remedied these
11 contributions 126 and 758 days, respectively, after their receipt.

12 While the Committee requests the Commission take no further action, or refer this matter
13 to ADRO,⁴⁵ the Commission has pursued matters involving similar acceptance of excessive and
14 prohibited contributions.⁴⁶

15 As such, the Commission finds reason to believe that the Committee violated 52 U.S.C.
16 § 30116(f) and 11 C.F.R. §§ 103.3(b)(3), 110.9 by accepting excessive contributions totaling
17 \$175,200; 52 U.S.C. § 30118(a) and 11 C.F.R. §§ 103.3(b), 110.4(c)(3), 110.9 by accepting
18 prohibited contributions totaling \$5,500; and 38 U.S.C. §§ 30116(f) and/or 30118(a) and

⁴³ Referral at 5; *id.*, Attach. 2 at 2-6.

⁴⁴ *See id.*, Attach. 2 at 2-5.

⁴⁵ Resp. at 1-2.

⁴⁶ *See* F&LA at 1-3, MUR 7902 (Michigan Democratic State Central Committee) (finding reason to believe that a committee accepted excessive contributions, even though the committee remedied some of them, where the contributions were untimely remedied); F&LA at 1-2, MUR 7374 (Wright 2016) (finding reason to believe that the committee accepted excessive and prohibited contributions, despite the committee refunding some of them, where the contributions were untimely refunded).

MUR 8070 (Democratic Executive Committee of Florida)

Factual and Legal Analysis

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- 1 11 C.F.R. § 103.3(b) by accepting an excessive and/or prohibited \$20,000 contribution from an
- 2 unregistered organization.